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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE Troy Lee Boyd and
Susan St. John Boyd

) Case No. 10-44327

)

)

Debtor s) Chapter 13

MOTION TO EXTEND AUTOMATIC STAY

The Debtors hereby move this Court, pursuant to §362(c)(3)(B), for an order continuing the automatic stay provided under § 362(a) as to all creditors. In support of this motion, the Debtors state as follows:

1. The Debtors filed a petition under chapter 13 on July 1, 2010.

2. The Debtor had previously filed a chapter 13 case which was dismissed on May 28, 2010.

4. The petition in this case has been filed in good faith. The Debtors believe that the chapter 13 plan they have submitted will be confirmed and that they will be able to fully perform under the terms of the plan.

5. The Debtor's prior chapter 13 case, dismissed on May 28, 2010 was the only previous case by the Debtor that was pending during the preceding year.

6. The Debtor's prior chapter 13 case was not dismissed because the Debtors failed to file or amend their petition, or to provide adequate protection ordered by the court.

7. The debtors seek to extend the stay to Bank of America, Crockett National Bank and PNC Mortgage.

8. The debtors expect a substantial change in their financial affairs because they will be surrendering property.

9. No creditor moved for relief from automatic stay in the previous case.

WHEREFORE, the Debtor requests that this Court continue the automatic stay under § 362(a) as to all creditors for the duration of this chapter 13 proceeding, or until such time as the stay is terminated under § 362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d).

Respectfully submitted,

/s/Brenda Rotramble

Brenda Rotramble
Attorney for Debtors

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CERTIFICATE OF SERVICE

The undersigned certifies that she has, on the date shown below, by first class mail addressed to their respective addresses of record in this case, transmitted and served a true copy of this document to the United States Trustee, the Chapter 13 Trustee, and to each creditor to whom a stay extension is requested..

Date: 07/01/10

s/s _____ Brenda Rotramble